## **EXHIBIT B**

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**Cristina Thrasher** 

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October 13, 2023

<u>Via Federal Express</u> Tracking No.: 7737 3428 4754

Isa S. Dougan, Owner Isa S. Dougan d.b.a. United Collision 4241 East Brundage Lane Bakersfield, CA 93307

Re: Requirements Agreement dated November 20, 2017 between BASF Corporation and Isa S. Dougan d.b.a. United Collision

Dear Mr. Dougan:

This letter serves as a demand for repayment of amounts owed to BASF Corporation ("BASF") of \$138,910.85 as a result of Isa S. Dougan d.b.a. United Collision's ("United Collision") unilateral termination of the Requirements Agreement dated November 20, 2017, and United Collision's failure to honor its contractual obligations to BASF pursuant to the terms of the above-referenced Agreement. Specifically, since the breach of the Requirements Agreement, United Collision is in default of its obligation to: 1) purchase BASF Refinish Products as 100% of its requirements for Refinish Products, specifying only BASF Glasurit and RM brand products; 2) purchase a minimum of \$729,000 in the aggregate of BASF Glasurit and RM products, net of all distributor discounts, rebates, returns and credits; 3) repay the Contract Fulfillment Consideration in accordance with the terms set forth in the above-referenced Agreement; and 4) return the BASF equipment loaned to United Collision or refund the value of the equipment.

In the event that United Collision or Mr. Dougan fail to repay the amount owed, within ten (10) days of the date of receipt of this letter, BASF will refer this matter to litigation and will seek all damages to which BASF is entitled, for payment of the \$138,910.85 and lost profits, resulting from United Collision's breach of the Requirements Agreement.



If you are represented by an attorney, please have him/her contact me. If you are not represented by an attorney and are interested in resolving this matter amicably, please:

- 1. Contact me directly at telephone No. 973-245-7984; or
- 2. Remit payment in full by certified bank check to BASF Corporation, mailed to the attention of:

Mr. Randy Tucker Distribution Programs Coordinator BASF Corporation 26701 Telegraph Road Southfield, MI 48033

Very truly yours,

Cristina Thrasher Senior Litigation Counsel

cc: Matthew Lacey Randy Tucker Andrew Tait